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May 19, 2004

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

***Re: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
Docket No. 03-00633***

Dear Chairman Tate:

Enclosed for filing in the above-referenced docket are the original and thirteen copies of the individual coalition members' Statements in Support of Projected Date of Local Number Portability Technical Capacity in the above-referenced matter.

Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Sincerely,


Tara L. Swafford

TLS:bb
Enclosures

CERTIFICATE OF SERVICE

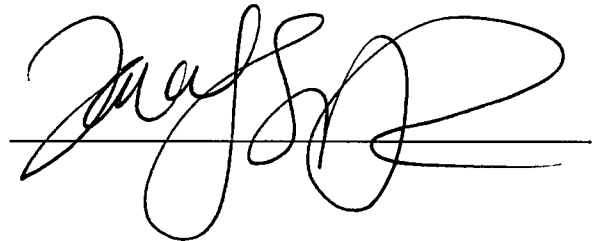
I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on May 19th, 2004, upon:

Paul G. Summers, Esq.
Vance L. Broemel, Esq.
Timothy C. Phillips, Esq.
OFFICE OF THE ATTORNEY GENERAL
CONSUMER ADVOCATE AND PROTECTION
DIVISION
425 5th Avenue North
Nashville, Tennessee 37202

*Attorneys for the Consumer Advocate and
Protection Division*

Melvin J. Malone, Esq.
J. Barclay Phillips, Esq.
MILLER & MARTIN PLLC
150 Fourth Avenue North
1200 First Union Tower
Nashville, TN 37219-2433

Attorneys for Intervenor Verizon Wireless

A handwritten signature in black ink, appearing to read "J. Barclay Phillips", is written over a horizontal line.

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF TERRY WALES IN SUPPORT OF PROJECTED DATE OF LNP
TECHNICAL CAPACITY FOR ARDMORE TELEPHONE COMPANY, INC**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: 11-24-04

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: NO

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: We have placed an order with Nortel to install LNP software in our switches and should have a installation schedule within the next 2 weeks. We are also in the process of contracting with BellSouth to be our database provider.

b. information regarding vendor availability and schedules;

RESPONSE: Same as 3a

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: Same as 3a

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: No other information available at this time

VERIFICATION

STATE OF ALABAMA

COUNTY OF LIMESTONE

The undersigned, Terry Wales, being the General Manager with Ardmore Telephone Company, Inc. after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

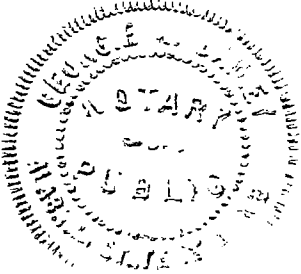
By: Terry M. Wales

Title: General Manager

Sworn and subscribed before me this
14 day of May, 2004.

George A. Bailey
Notary Public

My Commission Expires: 9/30/07



**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF LEVOY KNOWLES
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
BEN LOMAND TELEPHONE COOPERATIVE, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: 05/24/04

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: No

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: N/A

b. information regarding vendor availability and schedules;

RESPONSE: N/A

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: N/A

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: Ben Lomand has exchanged "Trading Partner Agreements" with the following: Verizon, ATT Wireless, Sprint, Cingular, and Advantage Cellular. We have received a test script from Verizon, but no testing has yet been done. We are in the process of updating the NECA tariff to reflect being portable and have attempted to contract with Neustar for database service and Verisign for service order processing. There are not yet finalized.

VERIFICATION

STATE OF Tennessee)

COUNTY OF Warren)

The undersigned, Levoy Knowles, being the CEO with Ben
Lomard Telephone Co-op Inc., after being duly sworn, makes oath and verifies that the
information in the foregoing Statement in Support of Projected Date of LNP Technical capacity
are true and correct to the best of his knowledge, information and belief, and he is authorized and
entitled to execute this instrument.

By: Levoy Knowles

Title: CEO

Sworn and subscribed before me this
13 day of May, 2004.

Clara P. Byars
Notary Public

My Commission Expires: April 29, 2007

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF SUSAN SMITH IN SUPPORT OF PROJECTED DATE OF LNP
TECHNICAL CAPACITY FOR CENTURYTEL OF ADAMSVILLE, INC.,
CENTURYTEL OF CLAIBORNE, INC., AND CENTURYTEL OF OOLTEWAH-
COLLEGEDALE, INC.**

1 What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

CenturyTel of Adamsville, Inc., CenturyTel of Claiborne, Inc. and CenturyTel of Ooltewah-Collegedale, Inc. (collectively, "CenturyTel's") switches will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") on May 24, 2004.

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE:

Yes. CenturyTel's projected date of LNP Technical Capacity is now May 24, 2004. In the Amended Petition, the date for each of the CenturyTel companies was identified as September 2, 2004. CenturyTel has subsequently decided to expedite the work activities required to make its switches technically capable by May 24, 2004.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:
- a. dates of delivery for software or equipment;

RESPONSE:

Not applicable

- b. information regarding vendor availability and schedules;

RESPONSE:

Not applicable.

- c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE:

Not applicable

d. any other information that informs the TRA regarding your LNP

Technical Capacity date.

RESPONSE:

Not applicable.

1

VERIFICATION

STATE OF TEXAS)
)
COUNTY OF BOWIE)

The undersigned, Susan Smith, being the Director of External Affairs with CenturyTel, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: *Susan Smith*

Title: Director External Affairs

Sworn and subscribed before me this
17th day of May, 2004.

Patricia S. Chatham
Notary Public

My Commission Expires: 5/29/07

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF LESLIE GREER
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
DTC COMMUNICATIONS**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: 10/31/04

2 Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: NO CHANGE

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: New equipment was purchased instead of upgrading existing old equipment. New switch was delivered 03/18/04.

b. information regarding vendor availability and schedules;

RESPONSE: see below

c statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training), and

RESPONSE: Installation is complete / we are in testing states now (05/14/04). Due date for live traffic through new switch is 10/01/04.

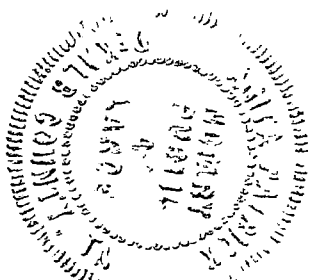
d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: We have signed a contract with Syniverse to handle our service order activity and to assist in the implementation of LNP. Estimated completion date for this is pending.

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF JACKSON)

The undersigned, **Leslie Greer**, being the **Chief Executive Officer** with **DTC Communications** after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.



By: Leslie Greer

Title. **Chief Executive Officer**

Sworn and subscribed before me this
17th day of May, 2004

Anita Patrick
Notary Public

My Commission Expires: 5-1-2007

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF JAMES HAMBY
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
HIGHLAND TELEPHONE COOPERATIVE, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

Our projected date is August 24, 2004.

2 Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: No.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: N/A

b. information regarding vendor availability and schedules;

RESPONSE: N/A

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training), and

RESPONSE: N/A

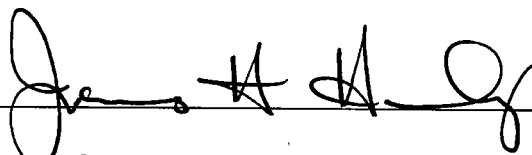
d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: We are in the process of completing our switch translations. We are also checking with data base vendors.

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF _____)

The undersigned, **James Hamby**, being the Information Systems Manager with **Highland Telephone Cooperative, Inc.**, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: 
Title. Information Systems Manager

Sworn and subscribed before me this
17th day of May, 2004.


Notary Public

My Commission Expires: 8-21-07



**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of

Tennessee Coalition of Rural
Incumbent Telephone Companies
And Cooperatives
Request for Suspension of Wireline to
To Wireless Number Portability Obligations
Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended

)
)
) Docket No 03-00633
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**STATEMENT OF LOUISE BROWN
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
LORETTO TELEPHONE COMPANY, INC.**

1 What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: Loretto Telephone Company's switches are technically capable of implementing wireline to wireless local number portability at this time (providing we have a path to route the call out of our switches). In order for LNP to work properly and as planned we need interconnection agreements with the wireless carriers or some type of arrangement to route these calls over a IXC's trunk. **Without some type of an agreement on rating and routing LNP is not going to work.** The switch will have no way to route the call and it will drop the call to reorder. This issue must be settled before we can even begin to implement, test or train for LNP.

2 Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date

RESPONSE: No, there are several issues that have to be resolved before an actual ported call can be completed out of Loretto. Of these, rating and routing is the major issue that must be settled.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following

a. dates of delivery for software or equipment,

RESPONSE: Even though our switches are at present technically capable of performing LNP functions there is still the issue of how we are to route the calls that are ported out to the carrier of the ported number. Also there are service order agreements that have to be negotiated between Loretto and the wireless carriers, testing will have to be completed and information added to the national database. We do not see how we could possibly complete this by May 24th.

b information regarding vendor availability and schedules;

RESPONSE: In talking to vendors each step of the process will take longer than first anticipated, due to the volume of request from companies all across the country.

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training), and

RESPONSE: Establishment of an NPAC Agreement is expected to take 3 to 4 weeks; establish Service Order Administration is expected to take 3 to 4 weeks; and testing is expected to take at least 2 weeks.

d. any other information that informs the TRA regarding your LNP Technical Capacity date

RESPONSE: The above timeline will probably take longer than stated due to Neustar being backlogged on getting their portion of the work completed.

VERIFICATION

STATE OF TENNESSEE)

COUNTY OF Lawrence)

The undersigned, **Louise Brown**, being the President with **Loretto Telephone Company, Inc.**, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of her knowledge, information and belief, and she is authorized and entitled to execute this instrument

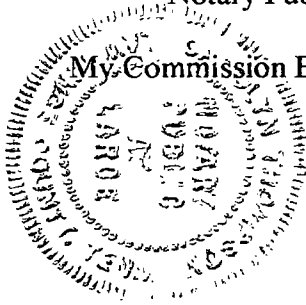
By Louise Brown
Title President

Sworn and subscribed before me this
17th day of May, 2004

Caroleyn Thompson

Notary Public

My Commission Expires 2/4/2007



**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF F. THOMAS ROWLAND IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR NORTH CENTRAL TELEPHONE
COOPERATIVE, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

May 24, 2004

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE:

Yes.

Nortel has installed LTP translations software on our switch and we are now testing with our database provider to ensure LNP functionality. We have a projected completion date of May 24, 2004.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

- a. dates of delivery for software or equipment;

RESPONSE:

Not applicable.

- b. information regarding vendor availability and schedules;

RESPONSE:

Not applicable

- c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE:

Not applicable

d. any other information that informs the TRA regarding your LNP

Technical Capacity date.

RESPONSE:

Not applicable

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF MACON)

The undersigned, F. Thomas Rowland, being the President and CEO with North Central Telephone Cooperative, Inc., after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

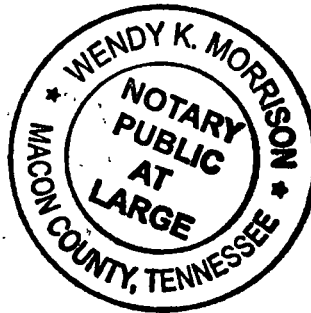
By: 

Title: President and CEO

Sworn and subscribed before me this
17th day of May, 2004.


Notary Public

My Commission Expires: 12/17/07



**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF BRUCE H. MOTTERN IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR TDS Telecom**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

As of April 30, 2004, all TDS Telecom Tennessee switches (hardware / software) are technically capable to implement wireless to wireline LNP.

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE:

Yes. TDS Telecom's previously provided implementation scheduled was based on the best information and resources available at that time. The change in implementation dates is a result of experience gained in the conversion (provisioning of LNP capability) of switches

throughout TDS Telecom, along with more resources being dedicated to the LNP implementation process.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE:

N/A

b. information regarding vendor availability and schedules;

RESPONSE:

N/A

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE:

N/A

d. any other information that informs the TRA regarding your LNP
Technical Capacity date.

RESPONSE:

N/A

VERIFICATION

STATE OF Tennessee)
COUNTY OF Davidson)

The undersigned, BRUCE MOTTERN, being the Director - Rev. & Earnings with TDS Telecom, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: Bruce Mottern

Title: Director - Revenue & Earnings

Sworn and subscribed before me this
13th day of May, 2004.
[Signature]
Notary Public
My Commission Expires: 2-1-06

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF ROBERT D. DUDNEY
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
TWIN LAKES TELEPHONE COOPERATIVE CORPORATION**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

MAY 24, 2004

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE:

NO

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following.

a. dates of delivery for software or equipment;

RESPONSE:

N/A

b. information regarding vendor availability and schedules;

RESPONSE:

N/A

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE:

N/A

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

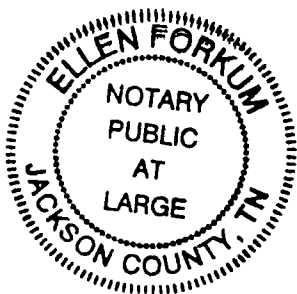
RESPONSE:

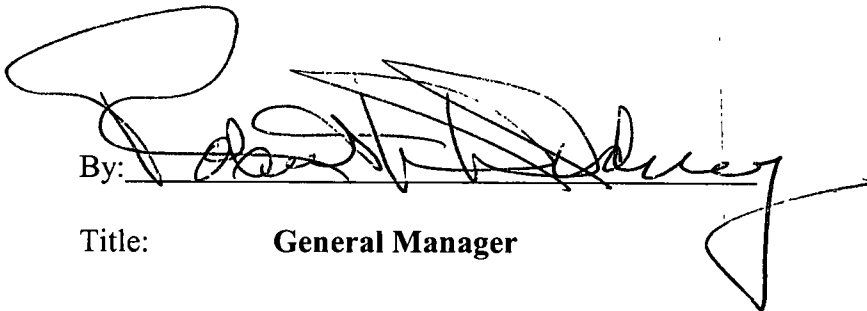
N/A

VERIFICATION

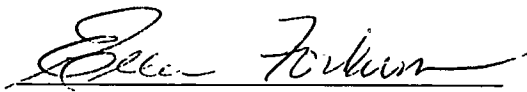
STATE OF TENNESSEE)
)
COUNTY OF JACKSON)

The undersigned, **Robert D. Dudney**, being the **General Manager** with **Twin Lakes Telephone Cooperative Corp.** after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.



By: 
Title: **General Manager**

Sworn and subscribed before me this
17th day of May, 2004.


Notary Public

My Commission Expires: 3/01/2008

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF KERRY WATSON
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
YORKVILLE TELEPHONE COOPERATIVE**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: Our vendors are trying to get all upgrades and translations by the May 24, 2004 deadline. However, we have just cut to a tandem Tecore switch last week. Both vendors, Mitel and Tecore, are working together on a daily basis to get this work completed by the May deadline. However, this is barring no unforeseen issues which could arise. With our previous experience with the Tecore vendor (we currently also have a Tecore switch for our cellular traffic) we feel that the quickly approaching deadline may not be met. In addition, proper testing must also take place before we would be ready to port numbers.

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: No, we are doing everything in our power to make sure that the switch vendors will be compliant. However, at this point we are reliant on them. We have already secured and implemented all paperwork with the NPAC and have gotten our LRN's loaded with the NPAC Help Desk. We will be utilizing the Help Desk for all porting requests. We would like to ask for a short extension of time until July 31, 2004.

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: We have previously stated that we are trying to be compliant by May 24, 2004 but this is without any delays. At this time, we would like to allow additional time in order to secure all vendor testing and implementation.

b. information regarding vendor availability and schedules;

RESPONSE: See attached letter.

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: See attached letter.

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: N/A

VERIFICATION

STATE OF TENNESSEE

COUNTY OF GIBSON

The undersigned, Kerry Watson, being the General Manager with Yorkville Telephone Cooperative, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: _____

Kerry Watson

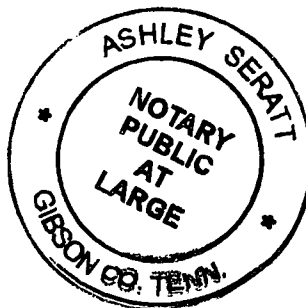
Title: General Manager

Sworn and subscribed before me this
14th day of May, 2004.

Ashley Seratt

Notary Public

My Commission Expires: 7-16-07





Mitel Networks
350 Legget Drive
Ottawa, Ontario
Canada K2K 2W7
Telephone: 613 592-2122

May 12, 2004

Yorkville Cooperative Telephone
2 Nebo-Yorkville Road, P O Box 126
Yorkville, Tennessee
38389

Subject LNP Implementation Dates

Dear Kerry,

The GX5000 has been LNP compliant since third quarter 2000. We understand that your site has been updated to the most current release that supports LNP, GS5011 V 01.1

Part 3c of the questionnaire refers to the LNP implementation dates. We are currently prepared to make necessary programming changes to enable the LNP feature. Before the programming can proceed, we will require the LNP information for the exchanges at YTC. Also, before the solution can be implemented, the TCORE tandem switch must also be able to accept and tandem the TCAP messages.

At the present time we have resources available to make the necessary programming changes, and we wait for your final LNP programming information.

Regards,

Rob Clarke
Mgr Technical Support
Mitel Networks
350 Legget Drive
Kanata, Ontario
K2K 2W7

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF W. S. HOWARD
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
MILLINGTON TELEPHONE COMPANY**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: November 15, 2004

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: Yes. Internal scheduling and coordination with the vender has improved. The new date is July 30, 2004.

3 If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE: The delivery of software upgrades extends beyond the May 24, 2004 deadline.

b information regarding vendor availability and schedules;

RESPONSE: The vendor's availability to do datafill operations extend beyond the initial software load.

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: The vendor does not project testing and training time frames at this time.

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: Internal service order procedures and billing systems are currently being addressed. We have had discussions with consultants to assist in this process. Rating and routing issues still need to be addressed.

VERIFICATION

STATE OF Tennessee)

COUNTY OF Shelby)

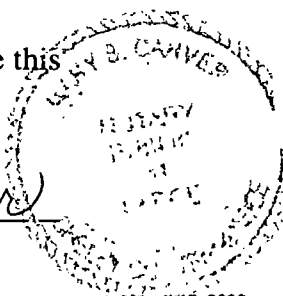
The undersigned, WS Howard, being the GENERAL MGR with MILLINGTON TELEPHONE after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: WS Howard

Title:

Sworn and subscribed before me this
17th day of May, 2004.

Mary B. Carver
Notary Public



My Commission Expires: _____ My Commission Expires April 15, 2008

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of

Tennessee Coalition of Rural
Incumbent Telephone Companies
And Cooperatives
Request for Suspension of Wireline to
To Wireless Number Portability Obligations
Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended

)
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Docket No. 03-00633

**STATEMENT OF GREG ANDERSON
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
BLEDSON TELEPHONE COOPERATIVE, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE:

December 31, 2004

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE:

No

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

a. dates of delivery for software or equipment;

RESPONSE:

Not yet scheduled.

b. information regarding vendor availability and schedules;

RESPONSE:

N/A

c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE:

N/A

d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE:

N/A

VERIFICATION

STATE OF TENNESSEE)
)
COUNTY OF Bledsoe)

The undersigned, **Greg Anderson**, being the General Manager (title) with **Bledsoe Telephone Cooperative, Inc.**, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of his knowledge, information and belief, and he is authorized and entitled to execute this instrument.

By: Greg Anderson
Title: General Manager

Sworn and subscribed before me this
18 day of May, 2004.

Caryn M. Stucky
Notary Public

My Commission Expires: 9/1/06

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF LERA ROURKE
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
WEST TENNESSEE TELEPHONE COMPANY, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: **12/31/04**

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: **No**

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

- a. dates of delivery for software or equipment;

RESPONSE: 6/30/04

- b. information regarding vendor availability and schedules;

RESPONSE: See above.

- c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: 120 days from the date of delivery of the equipment for installing, activation, testing and training.

- d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: See attached memo. As small independent companies, these processes must be established and in place before we can implement LNP.

The FCC and industry have not resolved the facility issue.

VERIFICATION

STATE OF Louisiana)
Parish Orleans)
COUNTY OF Orleans)

The undersigned, Lera Roark, being the Vice President with West Tennessee Telephone Company, Inc, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of her knowledge, information and belief, and she is authorized and entitled to execute this instrument

By: Lera Roark

Title. Vice President

Sworn and subscribed before me this
14th day of May, 2004.

Barbara B. Barnes #23576
Notary Public

My Commission Expires: lifetime

TEC SERVICES, INC.



MEMORANDUM

DATE: May 12, 2004

FROM: Lera Roark

SUBJECT: Local Number Portability

Listed are some specific requirements to deploy LNP for Crockett, Peoples and West Tennessee Telephone Companies.

1. LNP software upgrade is required in the switch. We have not received a confirmation of price or delivery availability from Siemens.
2. The industry publications for the LERG (Local Exchange Routing Guide) and NPAC has to be updated to reflect that the switch is LNP capable. This is a six month process with an emergency procedure that allows notification in three months, however, until I have a delivery and install date I cannot start this process
3. LNP may trigger number pooling and if so, another complete set of problems and timelines will result.
4. Programming will be required in our subscriber billing system to denote when a customer has ported their number, who they ported to, date ported, and the number must be maintained in the billing system as the number will not be available to be re-assigned to another subscriber. Also programming will be required to handle toll calls that may be received after the number is ported and procedures developed to return toll calls to the originating carrier.
5. Programming will be required in the ticketing and recording system to handle ported numbers.
6. Programming will be required in the CABS billing system to handle ported numbers.
7. Programming will be required in the Write Off Recovery program to handle ported numbers
8. Procedures manual will need to be developed and written on the process, testing and changes to each system above for each ported number.
9. Procedure manual and processes to be developed for the porting process must contain at least the following minimum requirements:
 - a. Capability to validate porting out subscriber
 - b. Capability to accommodate a port-to-original
 - c. Pre-Port and Provisioning Systems - ICP (intercarrier communication process), LSR/FOC (local service request/firm order commitment), SOA

- (service order administration), connection to NPACs for provisioning of ported numbers, LSMS (local service management system)
- d. How to deal with snapback and treatment of disconnected numbers
 - e. How to deal with Default Routed Calls and options
 - f. Determine and develop procedures for trunking capacities, forecasts, traffic type, etc.
 - g. Exchange of data with trading partners such as basic contact information including escalation list and process, day-to-day personnel info
 - h. Develop basic technical information sufficient to allow pre-port customer validation (transmission method, fax numbers, test system information)
 - i. Basic information for customer validation (mandatory information fields)
 - j. Business Days/Hours for Porting
 - k. Testing Agreements/Arrangements
 - l. Employee Training
 - m. Customer/Community Education
 - n. Retention programs
10. A local routing number will be required and procedures set up with the local number portability database provider. (The LRN is obtained and established from INC and is a separate process. This number must be obtained before notifying industry LERG and NPAC). These procedures also include, but are not limited to, a Non-Disclosure Agreement, contracts for services and at what level the service will be provided such as a direct connection, service bureau approach, the low tech approach, i.e., will we call and report the number to be ported, handle via email, fax, etc
 11. Procedures must be established for E911 database removal, time lines, and release of the number so the new service provider can establish E911 information if available with the new carrier. How to handle mixed service (subscriber has service from both carriers until porting process is complete)
 12. Negotiate trading partner arrangements if needed. At a minimum we must exchange data and procedures for the porting process with the trading partners.
 13. Address and develop procedures to handle LIDB and CNAM issues and update of these databases for the ported number.
 14. Develop procedures and processes to port Type 1 Interconnections. This presents a whole new set of problems and processes because the number is assigned to a wireless carrier, but the telephone number used resides in the LEC switch.
 15. Determine who will be responsible for the LNP database dip and how cost recovery will be obtained, when the query should be launched, etc.
 16. Address what happens when the number has been ported from a wireline to wireless carrier and then is ported by the wireless carrier to another wireless carrier. How does information get back to the original carrier and how is the call handled and by whom?
 17. There is no information in the existing signaling that the terminating company can use to determine where a call originated. This creates several problems in trying to determine the jurisdiction of the call.

18. Testing with various trading partners to ensure the least amount of call fall-out.
19. Develop processes and procedures to handle fall-outs during the porting process.
20. **HOW IS THE CALL TO COMPLETE?** The carrier requesting the port may not have facilities in the rate center of the wireline company. **If not, is this considered rate center porting?** How can it be rate center porting when the location of the new carrier switch is in another rate center? (This appears to be geographic porting, not rate center porting) Who will pay for the facilities, transport costs, and other costs associated with the delivery of the call? In the absence of connecting facilities with the company who has requested the port, the call has no where to be delivered. Should the call be sent to a recording that it cannot be delivered as dialed?
21. If no facilities, one option is to send the call via 10-digit dialing so it can complete over the toll network. This requires delivering the call to the subscriber's pre-subscribed carrier. It will be up to the carrier to determine if a charge will be made to the subscriber for delivery of the call. Should the interexchange carrier also be required to pay the cost of transport for a CMRS carrier who wants to port a number?
22. These are only some of the problems and issues to be worked out in a six month process. Six months is an insufficient time frame to work out the problems, develop all the procedures and processes and make the necessary programming changes. Further, when contacting the many websites and industry organizations, no one has a specific process outline to assist small companies in establishing these procedures. There are a few consultants, but much of this work must be done by the individual company as each company will have a separate set of circumstances that will require processes specific to that company. In the absence of establishing a company specific program each company would be at the mercy of each CMRS carrier and may result in numerous variations based on CMRS carrier demands.
23. Many of the processes require contracts with third parties to perform various functions such as the database dip, porting of the number in the LNP database, etc
24. Develop cost recovery of the LNP process and file appropriate FCC tariffs.

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF LERA ROURKE
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
PEOPLES TELEPHONE COMPANY, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: 12/31/04

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: No

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

- a. dates of delivery for software or equipment;

RESPONSE: 6/30/04

- b. information regarding vendor availability and schedules;

RESPONSE: See above.

- c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: 120 days from the date of delivery of the equipment for installing, activation, testing and training.

- d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: See attached memo. As small independent companies, these processes must be established and in place before we can implement LNP.

The FCC and industry have not resolved the facility issue.

VERIFICATION

STATE OF Louisiana)
Parish)
COUNTY OF Orachita)

The undersigned, Lera Roark, being the Vice President with Peoples Telephone Company, Inc., after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of her knowledge, information and belief, and she is authorized and entitled to execute this instrument

By: Lera Roark

Title: Vice President

Sworn and subscribed before me this
14th day of May, 2004.

Barbara A. Barnes # 23576
Notary Public

My Commission Expires: lifetime

TEC SERVICES, INC.



MEMORANDUM

DATE: May 12, 2004

FROM: Lera Roark

SUBJECT: Local Number Portability

Listed are some specific requirements to deploy LNP for Crockett, Peoples and West Tennessee Telephone Companies.

1. LNP software upgrade is required in the switch. We have not received a confirmation of price or delivery availability from Siemens.
2. The industry publications for the LERG (Local Exchange Routing Guide) and NPAC has to be updated to reflect that the switch is LNP capable. This is a six month process with an emergency procedure that allows notification in three months, however, until I have a delivery and install date I cannot start this process
3. LNP may trigger number pooling and if so, another complete set of problems and timelines will result
4. Programming will be required in our subscriber billing system to denote when a customer has ported their number, who they ported to, date ported, and the number must be maintained in the billing system as the number will not be available to be re-assigned to another subscriber. Also programming will be required to handle toll calls that may be received after the number is ported and procedures developed to return toll calls to the originating carrier.
5. Programming will be required in the ticketing and recording system to handle ported numbers.
6. Programming will be required in the CABS billing system to handle ported numbers.
7. Programming will be required in the Write Off Recovery program to handle ported numbers
8. Procedures manual will need to be developed and written on the process, testing and changes to each system above for each ported number.
9. Procedure manual and processes to be developed for the porting process must contain at least the following minimum requirements:
 - a. Capability to validate porting out subscriber
 - b. Capability to accommodate a port-to-original
 - c. Pre-Port and Provisioning Systems - ICP (intercarrier communication process), LSR/FOC (local service request/firm order commitment), SOA

- (service order administration), connection to NPACs for provisioning of ported numbers, LSMS (local service management system)
- d. How to deal with snapback and treatment of disconnected numbers
 - e. How to deal with Default Routed Calls and options
 - f. Determine and develop procedures for trunking capacities, forecasts, traffic type, etc.
 - g. Exchange of data with trading partners such as basic contact information including escalation list and process, day-to-day personnel info
 - h. Develop basic technical information sufficient to allow pre-port customer validation (transmission method, fax numbers, test system information)
 - i. Basic information for customer validation (mandatory information fields)
 - j. Business Days/Hours for Porting
 - k. Testing Agreements/Arrangements
 - l. Employee Training
 - m. Customer/Community Education
 - n. Retention programs
10. A local routing number will be required and procedures set up with the local number portability database provider. (The LRN is obtained and established from INC and is a separate process. This number must be obtained before notifying industry LERG and NPAC). These procedures also include, but are not limited to, a Non-Disclosure Agreement, contracts for services and at what level the service will be provided such as a direct connection, service bureau approach, the low tech approach, i.e., will we call and report the number to be ported, handle via email, fax, etc.
 11. Procedures must be established for E911 database removal, time lines, and release of the number so the new service provider can establish E911 information if available with the new carrier. How to handle mixed service (subscriber has service from both carriers until porting process is complete)
 12. Negotiate trading partner arrangements if needed. At a minimum we must exchange data and procedures for the porting process with the trading partners.
 13. Address and develop procedures to handle LIDB and CNAM issues and update of these databases for the ported number.
 14. Develop procedures and processes to port Type 1 Interconnections. This presents a whole new set of problems and processes because the number is assigned to a wireless carrier, but the telephone number used resides in the LEC switch.
 15. Determine who will be responsible for the LNP database dip and how cost recovery will be obtained, when the query should be launched, etc.
 16. Address what happens when the number has been ported from a wireline to wireless carrier and then is ported by the wireless carrier to another wireless carrier. How does information get back to the original carrier and how is the call handled and by whom?
 17. There is no information in the existing signaling that the terminating company can use to determine where a call originated. This creates several problems in trying to determine the jurisdiction of the call.

18. Testing with various trading partners to ensure the least amount of call fall-out
19. Develop processes and procedures to handle fall-outs during the porting process
20. **HOW IS THE CALL TO COMPLETE?** The carrier requesting the port may not have facilities in the rate center of the wireline company. **If not, is this considered rate center porting?** How can it be rate center porting when the location of the new carrier switch is in another rate center? (This appears to be geographic porting, not rate center porting.) Who will pay for the facilities, transport costs, and other costs associated with the delivery of the call? In the absence of connecting facilities with the company who has requested the port, the call has no where to be delivered. Should the call be sent to a recording that it cannot be delivered as dialed?
21. If no facilities, one option is to send the call via 10-digit dialing so it can complete over the toll network. This requires delivering the call to the subscriber's pre-subscribed carrier. It will be up to the carrier to determine if a charge will be made to the subscriber for delivery of the call. Should the interexchange carrier also be required to pay the cost of transport for a CMRS carrier who wants to port a number?
22. These are only some of the problems and issues to be worked out in a six month process. Six months is an insufficient time frame to work out the problems, develop all the procedures and processes and make the necessary programming changes. Further, when contacting the many websites and industry organizations, no one has a specific process outline to assist small companies in establishing these procedures. There are a few consultants, but much of this work must be done by the individual company as each company will have a separate set of circumstances that will require processes specific to that company. In the absence of establishing a company specific program each company would be at the mercy of each CMRS carrier and may result in numerous variations based on CMRS carrier demands.
23. Many of the processes require contracts with third parties to perform various functions such as the database dip, porting of the number in the LNP database, etc.
24. Develop cost recovery of the LNP process and file appropriate FCC tariffs.

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In the Matter of)	
)	
Tennessee Coalition of Rural)	Docket No. 03-00633
Incumbent Telephone Companies)	
And Cooperatives)	
Request for Suspension of Wireline to)	
To Wireless Number Portability Obligations)	
Pursuant to Section 251(f)(2) of the)	
Communications Act of 1934, as Amended)	

**STATEMENT OF LERA ROURKE
IN SUPPORT OF PROJECTED DATE OF
LNP TECHNICAL CAPACITY FOR
CROCKETT TELEPHONE COMPANY, INC.**

1. What is the projected date that your switch(es) will be technically capable to implement wireline to wireless local number portability ("LNP Technical Capacity") as stated in Attachment A to the Amended Petition for Suspension?

RESPONSE: 12/31/04

2. Has your projected date of LNP Technical Capacity changed since the filing of the Amended Petition for Suspension? If so, please explain why and list your new date.

RESPONSE: No

3. If your projected date of LNP Technical Capacity is beyond May 24, 2004, please explain why that is the case, including a discussion of the following:

- a. dates of delivery for software or equipment;

RESPONSE: 6/30/04

- b. information regarding vendor availability and schedules;

RESPONSE: See above.

- c. statements of vendors regarding timelines necessary for all LNP implementation activities (including installation, activation, testing and training); and

RESPONSE: 120 days from the date of delivery of the equipment for installing, activation, testing and training.

- d. any other information that informs the TRA regarding your LNP Technical Capacity date.

RESPONSE: See attached memo. As small independent companies, these processes must be established and in place before we can implement LNP.

The FCC and industry have not resolved the facility issue.

VERIFICATION

STATE OF Louisiana)
Parish Orachita)
COUNTY OF Orachita)

The undersigned, Lera Roark, being the Vice President with Crockett Telephone Company, Inc, after being duly sworn, makes oath and verifies that the information in the foregoing Statement in Support of Projected Date of LNP Technical capacity are true and correct to the best of her knowledge, information and belief, and she is authorized and entitled to execute this instrument.

By: Lera Roark

Title: Vice President

Sworn and subscribed before me this
14th day of May, 2004

Barbara H. Barnes #23576
Notary Public

My Commission Expires. lifetime

TEC SERVICES, INC.



MEMORANDUM

DATE: May 12, 2004

FROM: Lera Roark

SUBJECT: Local Number Portability

Listed are some specific requirements to deploy LNP for Crockett, Peoples and West Tennessee Telephone Companies.

1. LNP software upgrade is required in the switch. We have not received a confirmation of price or delivery availability from Siemens.
2. The industry publications for the LERG (Local Exchange Routing Guide) and NPAC has to be updated to reflect that the switch is LNP capable. This is a six month process with an emergency procedure that allows notification in three months, however, until I have a delivery and install date I cannot start this process
3. LNP may trigger number pooling and if so, another complete set of problems and timelines will result
4. Programming will be required in our subscriber billing system to denote when a customer has ported their number, who they ported to, date ported, and the number must be maintained in the billing system as the number will not be available to be re-assigned to another subscriber. Also programming will be required to handle toll calls that may be received after the number is ported and procedures developed to return toll calls to the originating carrier.
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- (service order administration), connection to NPACs for provisioning of ported numbers, LSMS (local service management system)
- d. How to deal with snapback and treatment of disconnected numbers
 - e. How to deal with Default Routed Calls and options
 - f. Determine and develop procedures for trunking capacities, forecasts, traffic type, etc.
 - g. Exchange of data with trading partners such as basic contact information including escalation list and process, day-to-day personnel info
 - h. Develop basic technical information sufficient to allow pre-port customer validation (transmission method, fax numbers, test system information)
 - i. Basic information for customer validation (mandatory information fields)
 - j. Business Days/Hours for Porting
 - k. Testing Agreements/Arrangements
 - l. Employee Training
 - m. Customer/Community Education
 - n. Retention programs
10. A local routing number will be required and procedures set up with the local number portability database provider. (The LRN is obtained and established from INC and is a separate process. This number must be obtained before notifying industry LERG and NPAC). These procedures also include, but are not limited to, a Non-Disclosure Agreement, contracts for services and at what level the service will be provided such as a direct connection, service bureau approach, the low tech approach, i.e., will we call and report the number to be ported, handle via email, fax, etc
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 14. Develop procedures and processes to port Type 1 Interconnections. This presents a whole new set of problems and processes because the number is assigned to a wireless carrier, but the telephone number used resides in the LEC switch.
 15. Determine who will be responsible for the LNP database dip and how cost recovery will be obtained, when the query should be launched, etc.
 16. Address what happens when the number has been ported from a wireline to wireless carrier and then is ported by the wireless carrier to another wireless carrier. How does information get back to the original carrier and how is the call handled and by whom?
 17. There is no information in the existing signaling that the terminating company can use to determine where a call originated. This creates several problems in trying to determine the jurisdiction of the call.

18. Testing with various trading partners to ensure the least amount of call fall-out
19. Develop processes and procedures to handle fall-outs during the porting process.
20. **HOW IS THE CALL TO COMPLETE?** The carrier requesting the port may not have facilities in the rate center of the wireline company. **If not, is this considered rate center porting?** How can it be rate center porting when the location of the new carrier switch is in another rate center? (This appears to be geographic porting, not rate center porting.) Who will pay for the facilities, transport costs, and other costs associated with the delivery of the call? In the absence of connecting facilities with the company who has requested the port, the call has no where to be delivered. Should the call be sent to a recording that it cannot be delivered as dialed?
21. If no facilities, one option is to send the call via 10-digit dialing so it can complete over the toll network. This requires delivering the call to the subscriber's pre-subscribed carrier. It will be up to the carrier to determine if a charge will be made to the subscriber for delivery of the call. Should the interexchange carrier also be required to pay the cost of transport for a CMRS carrier who wants to port a number?
22. These are only some of the problems and issues to be worked out in a six month process. Six months is an insufficient time frame to work out the problems, develop all the procedures and processes and make the necessary programming changes. Further, when contacting the many websites and industry organizations, no one has a specific process outline to assist small companies in establishing these procedures. There are a few consultants, but much of this work must be done by the individual company as each company will have a separate set of circumstances that will require processes specific to that company. In the absence of establishing a company specific program each company would be at the mercy of each CMRS carrier and may result in numerous variations based on CMRS carrier demands.
23. Many of the processes require contracts with third parties to perform various functions such as the database dip, porting of the number in the LNP database, etc
24. Develop cost recovery of the LNP process and file appropriate FCC tariffs.